

FILED

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Western District of Texas

JUL 12 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY EP  
DEPUTY CLERK

United States of America )

v. )

Ramon Arredondo )  
Veronica Rosales )Case No. EP-23-M-2081-RFC(1)(2)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 10, 2023 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

Code Section

Title 8 U.S.C. § 1324(a)(1)(A)(v)(I)

Offense Description

Conspiracy to Transport/Harbor Illegal Aliens

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.Oath Telephonically Sworn  
At 11:52 PM  
Fed.R.Crim.P.4.1(b)(2)(A)

Complainant's signature

Specian Agent Mia Van Houzen

Printed name and title

Sworn to before me and signed in my presence.

Date: July 12, 2023City and state: El Paso, Texas

Judge's signature

U.S. Magistrate Judge Robert F. Castaneda

Printed name and title

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Mia Van Houzen, a Special Agent of Homeland Security Investigations (HSI), being duly sworn, hereby states:

**AGENT BACKGROUND**

1. I am an "Investigative or Law Enforcement Officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), and am empowered by law to conduct investigations and to make arrests for various offenses listed in Titles 8, 18, 19, 21, 22, and 31, to include offenses alleged herein.
2. I am a Special Agent of Homeland Security Investigations (HSI) assigned to the El Paso Field Office, Human Smuggling Group. I have been employed with HSI since November 2019 and have been a Special Agent since August 2022. I received specialized training at the Federal Law Enforcement Training Centers, located in Glynco, Georgia, on the investigation of human smuggling organizations. My prior experience includes serving as a Police Officer in Baton Rouge, Louisiana. I am currently a Major in the Army Reserves with over 19 years of service. My experience in the Army includes Counter Threat Finance and Military Intelligence specializing in HUMINT. I earned a master's degree in Cybersecurity, bachelor's degree in criminology.

**PURPOSE**

3. This affidavit is submitted in support of a criminal complaint charging Ramirez, Isac with violation of Title 8 U.S.C. § 1324(a)(1)(A)(v)(I) – Conspiracy to Transport Illegal Aliens.

**PARAMETERS**

4. The information contained in this affidavit is based upon my investigation of this matter as well as my training and experience, and the training and experience of other law enforcement officers. Since this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not contain all the information known to me or other law enforcement officers involved in this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that there is evidence of a violation of Title 8 U.S.C. § 1324(a)(1)(A)(v)(I) – Conspiracy to Transport Illegal Aliens.

**STATEMENT OF FACTS**

On July 11, 2023 at approximately 2000 hours National Guard observers advised US Border Patrol (USBP) that they observed several subjects entering into the United States approximately half a mile west of the Santa Teresa Port of Entry. USBP agents in the reported area observed a maroon-colored sedan (SUSPECT VEHICLE) picking up several subjects near the Stanco warehouse and drive east on Bi-national Ave. This area is frequently used by Transnational Criminal Organizations (TCOs) for smuggling due to its

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proximity to the U.S./Mexico border, proximity to highways, and desert brush that can provide concealment.

While Border Patrol was attempting to apprehend the SUSPECT VEHICLE in a desert area, the SUSPECT VEHICLE collided with a Border Patrol Agent (BPA) on an All-Terrain Vehicle (ATV). The BPA was not injured and the ATV sustained damage. The SUSPECT vehicle drove into the New Mexico landfill and drove off a steep drop-off damaging the SUSPECT vehicle's wheels. The Sunland Park Police Department (SPPD) attempted to perform a vehicle stop near Sunland Part Drive and McNutt Road, but the suspect vehicle failed to yield. The SUSPECT vehicle continued to flee into El Paso, Texas and the SPPD discontinued the pursuit. The Air and Marine helicopter continued monitoring the SUSPECT VEHICLE and informed Texas Department of Public Safety (TXDPS) of the SUSPECT VEHICLE's movement through El Paso from Loop 375 onto Alameda Ave. Near the La Patrona Bar at 7255 Alameda Drive, the SUSPECT VEHICLE stopped and dropped of several subjects who all fled into separate directions and evaded apprehension.

The SUSPECT vehicle continued to flee east on Alameda Ave. through several streets and neighborhoods. TXDPS apprehended the driver and passenger of the SUSPECT VEHICLE after their vehicle hit a rock wall at the San Marcos Apartments in El Paso, TX. The driver, later identified as Ramon ARREDONDA, attempted to flee on foot, but surrendered after about 50 feet. The passenger, later identified as Veronica ROSALES, attempted to pass as a pedestrian in the apartment complex parking lot. USBP arrived at the scene and apprehended ARREDONDA and ROSALES. Both suspects are U.S. Citizens and were transported to the Santa Teresa Border Patrol Station.

On July 11, 2023, Homeland Security Investigation (HSI) Special Agent (SA) Mia Van Houzen and BPA Steven Helinshi conducted recorded post-Miranda interviews of ARREDONDA and ROSALES, both subjects stated that they understood their rights and agreed to be interviewed without an attorney present. ARREDONDA stated that he was the driver of the SUSPECT VEHICLE and that he and ROSALES both owned and paid for the vehicle. ARREDONDA was aware that the passengers he picked up were Undocumented Non-Citizens (UNCs) since they just crossed the border illegally and the arrangements ROSALES made before picking them up. ARREDONDA stated that this is the only time he has participated in alien smuggling, but that ROSALES, who he stated is his girlfriend, has been involved with alien smuggling on various occasions. ARREDONDA agreed to pick up UNCs with ROSALES because it is his car too and he did not want her to go alone. ARREDONDA did not know the nationalities or names of the UNCs, but stated they were seven young men. ARREDONDA stated that ROSALES agreed to transport the UNCs from a location in the Santa Teresa, NM border area and received locations for pick up and drop off on her phone via WhatsApp. ARREDONDA stated that he planned to split the \$2000 payment that ROSALES was planning to receive. ARREDONDA stated that he fled law enforcement because he was fearful of being caught and does not recall hitting the ATV, he thought he hit something else.

ROSALES stated that earlier on July 10, 2023 she made arrangements with a contact on WhatsApp to pick up three or four UNCs in the desert area of Santa Teresa, NM near the U.S./Mexico border. ROSALES stated that she ended up picking up seven UNCs who all piled into the backseat of the SUSPECT VEHICLE. ROSALES stated that she was initially recruited to participate in human smuggling from a subject on

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Facebook and that most of the arrangements and requests for drivers is through WhatsApp. ROSALES stated that she frequently receives requests via WhatsApp messages for her to transport UNCs, but she rarely accepts the request due to other obligations. ROSALES was expecting to receive \$2000 to transport the UNCs to a location in El Paso, TX that was to be specified via WhatsApp. ROSALES stated that she usually received \$500 per person and was expecting that she would receive more than \$2000 since there ended up being seven UNCs instead of three or four. ROSALES stated that the location they dropped off the UNCs, at 7255 Alameda Drive, was specified by the subject she was making arrangements with on WhatsApp. When questioned about hitting the ATV, ROSALES stated that she thought that the ATV hit her vehicle and they tried to box them in so they panicked. ROSALES stated that she engaged in alien smuggling because she was experiencing financial hardship after being fired from her previous job at a call center due to medical issues.

New Mexico AUSA declined prosecution for assault on a federal officer. Texas AUSA Adam Hines accepted prosecution of 8 USC 1324 Conspiracy to Transport Aliens.

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Robert F. Castaneda  
United States Magistrate Judge  
Western District of Texas



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Mia R. Van Houzen  
Special Agent  
Homeland Security Investigations

Subscribed and sworn before me July 12, 2023.